I.   Preliminary Matter

In addressing the Applicant's arguments as submitted in the Amendment under 37

C.F.R. § 1.111 filed on March 21, 2006, the Examiner provides on pages 4, 5, 6, and 7 of the

Office Action, various screenshots of, allegedly, the Vaughn ezWriter program. Applicant

respectfully submits that the various screen shots have not been made of record, their source

remains unknown, and the date for these various screen shots has not been established by the

Examiner. At the present time, Applicant only has a copy of the ezWriter version 2.0 application

screenshots pages 1-15 submitted in an IDS filed on January 29, 2004. The source, origin, and

date of the newly provided slides by the Examiner remains unknown. Therefore, Applicant

respectfully requests that the Examiner provide the Applicant with a copy of the cited documents

in order for the Applicant to properly address the Examiner's arguments.

II.   Claim Rejections under 35 U.S.C. § 102(b) and 103(a)

Claims 1-32 have been rejected under 35 U.S.C. § 102(b) as anticipated by or, in the

alternative, under 35 U.S.C. § 103(a) as being obvious over Vaughn [ezWriter 2.0 for Window;

hereinafter "Vaughn"].

Claim 1

Claim 1 recites a "computer-implemented method for adding user-provided content to a

content object stored as a plurality of content entities in a data repository." The Examiner asserts

on page 3 of the Office Action that Vaughn discloses creating RTF files represented by an

ezWriter file that is an index, a user selects the name for the file "The Trifanton Castle Trilogy"

then selects <OK> and "The Trifanton Castle Trilogy" ezWriter file is created.

Claim 1 further recites "receiving *user-provided content*, assigning it an *identifier*, and storing it with its identifier in the *data repository*." The Examiner asserts on page 5 of the Office Action that in Vaughn, RTF documents contain user-provided texts, e.g. "This is the content of the First Chapter" which the Examiner asserts teaches the claimed user-provided content. The Examiner further asserts that the content of the "First Chapter" is assigned the file name, e.g., "First Chapter" when saving the content of the "First Chapter" to "The Trifanton Castle Trilogy" directory.

Claim 1 further recites "*adding* the *identifier* of the user-provided content to the *list of content entity identifiers*, whereby the user-provided content is added to the *content object*." The Examiner asserts that page 8 of Vaughn discloses "How to Add Entries to the Outline" in which the Examiner asserts a file name as an identifier of a user-provided content could be added to the outline as the list of content entity identifiers by selecting the [Edit, Outline] of the Outline Window pull-down menu to view the .ezw file, e.g. First Chapter.

However, the same aspect of Vaughn (adding "First Chapter" to the outline) appears to be cited for teaching different aspects of the claimed invention (i.e., the "receiving" and "adding" steps).

The Examiner refers to the addition of content to a user's outline such as the addition of "First Chapter" to "The Trifanton Castle Trilogy" ezWriter file for teaching both receiving user-provided content which is stored in a data repository and for adding an identifier to a list of content entity identifiers and the user-provided content is added to the content object. In particular, the identifier ("First Chapter") of the user-provided content cannot be added to the list

of content entity identifiers (The Trifanton Castle Trilogy file) as the Examiner asserts since the

user-provided content ("First Chapter") has already been stored in the data repository in the

"receiving" step (adding the "First Chapter" to "The Trifanton Castle Trilogy" according to the

Examiner). In particular, the Examiner is citing the same aspect of Vaughn for teaching both

receiving user-provided content, assigning it an identifier, and storing it with its identifier in the

data repository **and** adding the identifier of the user-provided content to the list of content entity

identifiers, whereby the user-provided content is added to the content object. Therefore, the

Examiner is citing the same operation of Vaughn, the addition of content to the outline, for

teaching distinguishable aspects of the claim.

Since the Examiner has not shown that all of the elements of claims are disclosed in the

cited art, claim 1 and its dependent claims should be deemed allowable. Since claims 4, 9, 12,

17, 20 and 31 recite similar elements, claims 4, 9, 12, 17, 20 and 31 and their dependent claims

should be deemed allowable for at least the same reasons.

Claim 31

To the extent claim 31 recites elements similar to claim 1, it should be deemed allowable

for at least the same reasons set forth above.

Claim 31 recites "storing said custom content object in said one ore more *object servers*;

and storing information specifying the custom content object and attribute information

concerning the custom content object in the *library server*." The Examiner asserts that ezWriter

folder "\ezWriter" discloses the claimed library server. However, the ezWriter folder, which

merely stores an ezWriter file, does not teach or suggest the claimed library _server_ which would

be apparent to one of ordinary skill in the art.

For at least the above reasons, claim 31 should further be deemed allowable.

III.   Conclusion

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,

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23373
CUSTOMER NUMBER

Date: August 21, 2006